LAW OFFICES
Mellon Webster & Shelly
A PROFESSIONAL CORPORATION
87 NORTH BROAD STREET
DOYLESTOWN, PA 18901
215-348-7700 • FAX 215-348-0171

scorr@mellonwebster.com
Direct Dial: 215-589-6140

THOMAS E. MELLON, JR.
SARA WEBSTER
CAROL A. SHELLY
STEPHEN A. CORR
THOMAS P. DONNELLY
SAMUEL C. TOTARO, JR.
ELISSA B. HEINRICHS
TINA SAGHAFI
THOMAS E. MELLON, III

DEBORAH A. ROMANSKI
JONATHAN A. BRISKIN, JD, MD
OF COUNSEL

June 14, 2010

<u>**VIA ELECTRONIC CASE FILING**</u>

Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street - Room 630
New York, NY 10007

> **Re:** *In re Terrorist Attacks on Sept. 11, 2001, 03 MDL 1570*
> *Havlish, et a. v. bin Laden, et al., 1:03-cv-9848*

Dear Judge Daniels:

Pursuant to your directive from the bench on April 15, 2010, I am pleased to advise all objections by the Plaintiff's Steering Committee regarding the filing of proofs in the above captioned case have been **withdrawn**. We are preparing to file our Memorandum of Proof in Support of Plaintiffs' Motion for Judgment by Default Against Sovereign Defendants with accompanying affidavits and would like to file that document as soon as possible.

A housekeeping matter pertains to our letter to you dated June 2, 2010, attached for your convenience. Before filing our Memorandum of Proof and presenting our proof to Your Honor, we will need a Court Order permitting us to file the Third Amended Complaint in the *Havlish* case to reflect the amendment to the Foreign Sovereign Immunities Act, i.e., application of the new §1605A. Please note the *Havlish* Plaintiffs' Motion for Leave to File a Third Amended Complaint in Order to Proceed Under Amendments to the Foreign Sovereign Immunities Act was filed with the Court *via* ECF on March 1, 2010 (Docket Document 2228).

Thank you for your attention to this matter.

Respectfully,

/s Thomas E. Mellon, Jr.

Thomas E. Mellon, Jr.

TEM:vmk
Enclosure
cc: All Counsel *via* Email

INTERNATIONAL SOCIETY OF PRIMERUS LAW FIRMS